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UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	Case Number: 23-cr-099 (LJL)
	:	
Plaintiff,	:	NOTICE OF PRETRIAL MOTIONS
	:	ON BEHALF OF THE DEFENDANT
v.	:	KEVIN PEREZ
	:	
KEVIN PEREZ,	:	
	:	
Defendant.	:	

TO: AUSAs Michael R. Herman, James A. Ligtenberg,
and Patrick Moroney
Office of the United States Attorney
1 St. Andrew's Plaza
New York, NY 10007

DEAR COUNSEL:

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned counsel for defendant Kevin Perez shall move before the Court for the following relief:

1. For an Order dismissing Count One of the Indictment for unconstitutional vagueness as it is insufficiently particular;
2. For an Order requiring the Government to issue a Bill of Particulars;
3. For an Order disclosing the Grand Jury transcripts;
4. For an Order directing the Government to provide any Rule 404(b) material;;
5. For an Order severing Counts Six through Eleven;
6. For an Order directing the Government to disclose outstanding *Brady/Giglio* evidence;
7. For an Order directing the early disclosure of *Jencks* Rule 3500 material at least three weeks prior to the time the Government expects the witnesses to testify;
8. For an Order directing the Government to provide any statements made by Defendant as to any alleged co-conspirator;
9. For an Order directing the Government to provide a list of recordings and other exhibits that the Government intends to offer as evidence at trial;
10. For an Order directing the Government to provide a witness list;
11. For an Order directing the Government to preserve and produce all notes of law enforcement agents;
12. For an Order directing the Government to provide notification of any expert witnesses to be used at trial;
13. For an Order directing the Government to provide statements of Defendant, the inspection of physical evidence, and reports of examinations and tests;
14. For an Order striking prejudicial surplusage from the indictment;
15. For an Order requiring the Government to provide a witness list;
16. For an Order requiring an audibility hearing;

17. For an Order allowing the filing of additional motions as they become appropriate.

PLEASE TAKE NOTICE that the undersigned counsel respectfully requests oral argument.

PLEASE TAKE FURTHER NOTICE that in support of this motion the undersigned will rely on the accompanying Memorandum and Appendix in Support of Pretrial Motions submitted herewith, as well as the requested oral argument.

Respectfully submitted,

/s/ Thomas R. Ashley

THOMAS R. ASHLEY, ESQ.

Attorney for Defendant Kevin Perez

Dated: December 20, 2024